

**UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LULAC, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No.: 3:21-CV-00259-DCG-JES-JVB
[Lead Case]

**MALC PLAINTIFFS' SUPPLEMENTAL AND REBUTTAL
DISCLOSURE OF DEPOSITION DESIGNATIONS**

Plaintiffs Mexican American Legislative Caucus (“MALC Plaintiffs”) hereby submit the following supplemental designations of deposition testimony pursuant to Federal Rule of Civil Rule of Civil Procedure 26(a)(3), and in accordance with the Court’s Pretrial Scheduling Order (Dkt. 880) and Order Extending Scheduling Order Deadlines (Dkt. 923). Plaintiffs also submit these written designations in lieu of calling live witnesses in its rebuttal case. The State Defendants are not opposed to this approach for the purposes of judicial economy. MALC does not object to State Defendants filing counter or cross-designations at whatever time works for the Court’s purposes.

Plaintiffs reserve the right to amend and supplement these deposition designations as appropriate, including but not limited to the right to designate deposition testimony in response to Defendants’ deposition designations, but does not anticipate the need to do so at this time.

MALC Plaintiffs’ Supplemental and Rebuttal Designations are set forth in the following attachments.

Exhibit 1: Deposition of Claudia Ordaz Perez, dated June 27, 2022.

Exhibit 2: Deposition of Armando Walle, dated August 25, 2022.

Date: June 11, 2025

Respectfully submitted,

SOMMERMAN, MCCAFFITY, QUESADA &
GEISLER, LLP

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ATTORNEYS FOR MALC PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically filed a true and correct copy of the above and foregoing via the Court's electronic filing system on the 11th day of June, 2025.

/s/ Sean J. McCaffity
Sean J. McCaffity